

BakerHostetler

Baker&Hostetler LLP

PNC Center
1900 East 9th Street, Suite 3200
Cleveland, OH 44114-3482

T 216.621.0200
F 216.696.0740
www.bakerlaw.com

James H. Rollinson
direct dial: 216.861.7075
jrollinson@bakerlaw.com

March 31, 2016

VIA ECF AND ELECTRONIC MAIL TO bernstein.chambers@nysb.uscourts.gov

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Room 723
New York, New York 10004-1408

Re: *Securities Investor Corporation v. Bernard L. Madoff Investment Securities LLC*,
Adv. Pro. No. 08-01789 (SMB) — *Picard v. Shapiro, et al.*, Adv. Pro. No. 10-05383 (SMB)

Dear Judge Bernstein:

We are counsel to the parties in the above-referenced adversary proceeding brought by Irving H. Picard (the “Trustee”), in his capacity as the trustee of the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC (“BLMIS”), under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff, against Stanley Shapiro and certain members of his family.

In accordance with this Court’s February 8, 2016 Order Granting In Part And Denying In Part Defendants’ Motion To Dismiss The Trustee’s Second Amended Complaint (ECF No. 63), the parties submit for your consideration their proposed Case Management Plan. If it meets with your approval, the parties respectfully request that the Case Management Plan be signed and entered on the Court’s docket.

The parties have complied with their obligations under Rule 26(f) of the Federal Rule of Civil Procedure, and at this time, there are no discovery-related issues that require the Court’s attention. Accordingly, the parties do not believe it is necessary for the Court to schedule a conference at this time, but we are available on the next “omnibus” hearing date—April 27, 2016—if the Court would like to hold a conference to discuss the Case Management Plan or address any other issues.

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This letter and the proposed Case Management Plan have been filed on the Court's docket, in accordance with your Honor's Chambers Rules.

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ James H. Rollinson
PNC Center
1900 E. 9th Street, Suite 3200
Cleveland, Ohio 44114
Telephone: 216.861.7075
Facsimile: 216.696.0740
James H. Rollinson
Email: jrollinson@bakerlaw.com
and
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Fernando A. Bohorquez, Jr.
Email: fbohorquez@bakerlaw.com

Attorneys for Plaintiff

Respectfully submitted,

LAX & NEVILLE LLP

By: /s/ Barry R. Lax
1450 Broadway, 35th Floor
New York, New York 10018
Telephone: 212.696.1999
Facsimile: 212.566.4531
Barry R. Lax
Email: blax@laxneville.com
Brian J. Neville
Email: bneville@laxneville.com
Robert Miller
Email: rmiller@laxneville.com

Attorneys for Defendants